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Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RONALD CARPENTER, JR., an individual;

Plaintiff,

vs.

GORDON DENNY, an individual; PV
HOLDING CORP. dba AVIS CAR RENTAL,
a foreign corporation; CANONICAL GROUP
LIMITED, a foreign corporation; DOES I
through V, inclusive and ROE
CORPORATIONS II through V, inclusive;
Defendants.

ALLSTATE INSURANCE COMPANY,

Intervenor.

CASE NO.: 2:23-CV-00208-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND AMENDED JOINT PRETRIAL
ORDER DEADLINE (FIRST REQUEST)**

Pursuant to Local Rules IA 6-1, 6-2 and LR 7-1, the undersigned counsel of record for Plaintiff, Defendants Gordon Denny and PV Holding Corp hereby STIPULATE to extend the time for the parties to file their Amended Joint Pretrial Order as set forth in the Court's Minute Order dated April 14, 2025 (ECF No. 68) by 30 days. The current deadline for said disclosure is May 15, 2025. This is the first stipulation seeking to extend the subject deadline. This extension would give the parties until June 13, 2025.

The parties submit that good cause exists for the requested extension. The parties are continuing their efforts in revising the previously submitted Proposed Joint Pre-Trial Order (ECF No. 67) in accordance with the Court's requirements. Moreover, there has been a COVID outbreak in

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1 defense counsel's office, including counsel for Defendant. Lastly, beginning on May 5, 2025,
2 counsel for Plaintiff has been presenting a wrongful death trial in Clark County District Court. This
3 trial is ongoing and expected to conclude on Monday, May 19, 2025. This, together with the reasons
4 stated above, has significantly delayed the parties' ability to finalize the disclosure.

5 The parties further submit that this extension is requested in good faith and with no dilatory
6 motive.

7 IT IS HEREBY STIPULATED by all parties, by and through their undersigned counsel, that
8 the deadline for the parties to submit their Joint Pretrial Order be extended to June 13, 2025.

9 Respectfully submitted,

10 DATED this 13th day of May, 2025.

DATED this 13th day of May, 2025.

11 **LADAH LAW FIRM**

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12 /s/ Ramzy P. Ladah

/s/ Robert P. Molina

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Gordon Denny and PV Holding Corp.

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19 **IT IS SO ORDERED.**

20 **DATED:** This 14th day of May, 2025.

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25 RICHARD F. BOULWARE, II
26 UNITED STATES DISTRICT JUDGE
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